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OFFICE OF THE EXECUTIVE SECRETARY

September 2, 1999

Mr. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE:

Docket No. 99-00585

Tariff to Grandfather and Restructure FONCARD Services

Dear Mr. Waddell:

Attached are the original and thirteen copies of Sprint Communications L.P.'s responses to the Tennessee Regulatory Authority's data request dated August 25, 1999.

If you have questions regarding this information, please contact Kaye Odum at 919-554-5277.

Sincerely,

C. Steve Parrott

C: Laura Sykora Kaye Odum Dennis Wagner Lenora Berg



Question 1. Do you consider the services that your company is proposing to grandfather (FONCARD Option A, FONCARD Option B, Stand-Alone FONCARD, Sprint 1000 FONCARD, and the Sprint Sense AnyTime Monthly Minutes of Use Credit option III) DDD services as defined by TRA Rule 1220-4-2-.55-(2)(d)? If the answer is no, please explain.

Response 1. No. Although these services are filed under Optional Calling Plans in the tariff, they are not part of a DDD service category as defined in TRA Rule 1220-4-2-.55(2)(d). In fact, FONCARD services were initially filed in Miscellaneous Section 5.6.1.1 (see attached) of the tariff. The FONCARD rate is also typically listed with each Optional Calling Plan product for ease of reference by customer care representatives. FONCARD services are not in the DDD service category because they are not DDD rate schedules, rates for operator assisted calls (0+ and 0-) or residential Optional Calling Plans as indicated in TRA Rule 1220-4-2-.55(2)(d).

Question 2. Other than rates, explain the service differences (i.e. functionality, customer benefits, etc.) between the existing FONCARD service which has a \$.50 per minute rate and the proposed FONCARD Option A service which has a \$.59 per minute rate and a \$.99 per call surcharge.

Response 2. All FONCARD service is basically the same functional service; the primary service differences are in the pricing structure and packaging.

Question 3. Other than rates, explain the service differences (i.e. functionality, customer benefits, etc.) between the existing services on page 73.1 (Sprint Sense FONCARD Option A, Sprint Sense FONCARD Option B, and Sprint Sense Stand Alone FONCARD) and the proposed services on page 73.1 (Sprint Sense FONCARD Option C and Sprint Sense Stand Alone Foncard Option A).

Response 3. See Response 2.

Question 4. Does the proposed grandfathering in the current tariff filing comply with all of the provisions set forth by the Authority in Docket No. 97-01387 (tariff filing by UTSE to obsolete Opportunity 800 service)?

Response 4. The proposed grandfathering in the current tariff complies with the provisions in Docket No. 97-01387 (UTSE tariff to Obsolete Opportunity 800 service) in that:

- a. There is no discrimination between existing and new customers because competitive alternatives exist for these customers. Some of the competitive alternatives are:
 - Sprint Sense AnyTime Monthly Minutes of Use Credit Calling Plan Option - \$.50 FONCARD rate
 - Optional FONCARD Rate and Toll Free Rate with Short Calls Waiver - \$.10 FONCARD rate (lesser rate)
 - Sprint 1000 \$.50 FONCARD usage rate
 - Sprint Sense Option FONCARD \$.30 usage rate (lesser rate)
 - Sprint Sense AnyTime Monthly Recurring Charge Waiver Option \$.50 usage rate

In addition both AT&T and MCI offer calling card options at or below \$.50

- b. The end of the grandfathering period is proposed in three years.
- c. If at the end of the grandfathering period, customers would be affected by an increase, notification will be made in accordance with TRA Rule 1220-4-2-.55(e)(2).